

JENSEN LAW OFFICE
CRIMINAL DEFENSE ATTORNEY

2122 NORTH BROADWAY
SANTA ANA, CALIFORNIA 92706
TELEPHONE (714) 973-7700
FACSIMILE (714) 973-1677

June 22, 2023

By ECF
Hon. Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: United States v. Niloufar Bahadorifar, 21 CR 430 (RA)

Dear Judge Abrams:

This letter is a request to delay the surrender date for defendant Niloufar Bahadorifar. She is currently scheduled to surrender on July 7, 2023 to the Federal Correctional Institution in Dublin, California. Defendant is currently undergoing diagnosis and treatment for several medical conditions. We are requesting to extend the date of surrender to October 13, 2023.

In order to preserve privacy, I will email the medical records to the court and the Government. A summary follows:

Ms. Bahadorifar saw Dr. Amini in late May of this year with several physical complaints. An MRI and an echocardiogram were performed. A second report from Dr. Amini on June 15, 2023 details all that needs to be accomplished in order to care for Ms. Bahadorifar. Her maladies are as follows:

Heart-The echocardiogram revealed a mitral valve prolapse and aortic valve abnormalities. Due to a history of heart disease in the family, Dr. Amini requests a second echocardiogram as well as a stress test.

Bleeding-Ms. Bahadorifar suffers from excessive internal and vaginal bleeding. Ms. Bahadorifar is waiting to see a gynecologist. Dr. Amini opines she may need to have her uterus removed due to fibroma in the uterus. In addition, the doctor said she needs an upper and lower endoscopy.

Anemia-Due to the bleeding, Ms. Bahadorifar suffers from severe anemia. The doctor prescribed iron injections to combat this.

Kidney-The doctor also found a cyst on her kidney as well as kidney stones.

Ms. Bahadorifar is currently bed ridden. She has little energy due to the blood loss and heart issues. She is taking prescribed medications for her heart, is taking pain medications and an antibiotic. She is navigating her way through her HMO and doing her best to diagnose and treat her various ailments. Therefore, we respectfully request the court extend her surrender date to October 13, 2023.

Respectfully submitted,



CHRISTIAN R. JENSEN